

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON)
SEPTEMBER 11, 2001) Civil Action No. 03 MDL 1570 (GBD)(FM)
)
)
)

This document relates to: All Actions

AFFIDAVIT OF AZAD IQBAL

I, Azad Iqbal, state under penalty of perjury as follows:

1. I am a citizen of the United Kingdom and currently reside in Jeddah, Saudi Arabia.

I have served as Group Legal Counsel of Saudi Binladin Group ("SBG") since 1989. This affidavit is based on personal knowledge or reasonable investigation.

SBG's Lack of United States Presence

2. SBG was organized in 1989 under the laws of Saudi Arabia as a limited partnership. Its principal office is in Jeddah, Saudi Arabia. SBG is one of the largest and most prestigious construction and engineering companies in the Middle East. Not including employees who work for its many subsidiaries, the company had tens of thousands of employees at the time the *Burnett* action was filed, and currently has approximately 90,000 employees.

3. During the three years prior to the filing of the *Burnett* action on August 15, 2002 ("the relevant time period"), SBG did not have an office in the United States, did not own any real estate in the United States, had no deposit accounts in the United States, and had no employees who SBG assigned to work from, or be based in, the United States. During that period, SBG was not licensed to do business in any state in the United States, did not have a

registered agent, was not involved in any construction or engineering projects in the United States, did not advertise its products or services in United States media, and did not derive any revenue from the sale of products or services in the United States.

SBG Subsidiaries

4. In 1993, a subsidiary of SBG, SBG-USA, was established in Maryland. SBG-USA, Inc. had one employee, Philip Griffin, a former U.S. State Department employee. SBG-USA was dissolved effective December 31, 1999.

5. Other than SBG-USA, which ceased to exist in 1999, SBG had no subsidiaries that were incorporated in or had their principal place of business in the United States. Nor did it have a majority ownership stake in any U.S.-based companies other than SBG-USA during the relevant time period.

6. SBG has numerous subsidiaries that are organized under the laws of Saudi Arabia and other foreign countries (hereinafter "foreign subsidiaries"). None of SBG's foreign subsidiaries was licensed to do business in the United States, maintained an office or registered agent in the United States, or regularly did business in the United States during the relevant time period. Likewise, none of SBG's foreign subsidiaries had distribution agreements with U.S.-domiciled companies for the distribution of products within the United States during that period.

7. SBG and its foreign subsidiaries from time to time entered into joint ventures and distribution arrangements directly or indirectly with U.S. companies, but those ventures were directed at the distribution of products or provision of services outside the United States and primarily in the Middle East. Likewise, SBG and its subsidiaries were retained by various branches of the U.S. military to provide construction and telecommunications services to the U.S. armed services in Saudi Arabia, but they did not perform any such projects in the United States.

8. One of SBG's Saudi subsidiaries, Marble & Granite International Co., Ltd. ("M&G") made one direct sale of granite to a customer in the United States during the relevant time period. The sale, which was valued at approximately \$13,500, was made in or about October 2001 to a company in Fort Myers, Florida. To the best of my knowledge, that sale represents the only direct sale by any of SBG's foreign subsidiaries of products or services in the United States during the relevant time period.

9. M&G advertised from time to time in Stone World, a magazine which, according to its website, is published in the United States but "has the largest circulation serving the international stone industry." Other than those advertisements, none of SBG's foreign subsidiaries advertised its products or services in the U.S. media during the relevant time period.

Integrated Visions

10. SBG does not now have, and never has had, any beneficial interest, either directly or indirectly, in Integrated Visions Group or eGlobal Business Inc.

Individuals

11. Dr. Abdellatif Khemakhem has served as an advisor to SBG in Jeddah, Saudi Arabia, since 1999. I understand that the plaintiffs have claimed that Dr. Khemakhem is on the board of directors of itRobotics. SBG has no beneficial interest, directly or indirectly, in itRobotics, and Dr. Khemakhem's role in that company, if any, is in his personal capacity.

12. Samir Akl is a former employee of Arabian Bemco Contracting Co. Ltd., an SBG subsidiary. He ceased working for Arabian Bemco Contracting Co. Ltd. in June 1998.

13. Based upon a review of the relevant employment records, SBG did not employ Abdalla Ibrahim Abdalla, Mohamed Saad, or Ibrahim Khader, or individuals with similar names, in connection with the Port Sudan Airport construction project or any other SBG project.

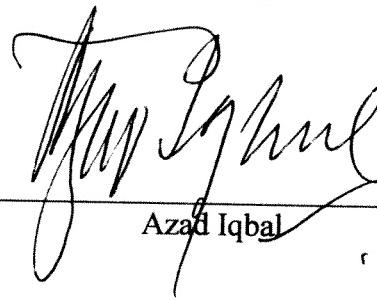
United States Travel

14. Based on reasonable investigation, SBG has identified the following employees who traveled to the United States on behalf of SBG during the relevant time period:

	Name	Dates of Travel	Destination	Purpose
1.	Fahd Rustom (possibly accompanied by Amr Abdel Bary)	Oct. 14–22, 1999	Greensboro, NC	Attend High Point furniture fair; stopover in New York
2.	Mohammed Abuzaid Hesham Bendari	Approximately Nov. 7–12, 1999	Chicago, IL	Attend “Computers for Contractors ’99” conference
3.	Issam Barghouti	5–7 day trip in or about 1999 (precise dates not available)	Boston, MA	Attend meeting with Bose Corporation engineers regarding sound system for Haram Grand Mosque in Mecca
4.	Fahd Rustom Amr Abdel Bary	Apr. 6–12, 2000	Greensboro, NC	Attend High Point furniture fair
5.	Bashar Al-Sibai	June 3–10, 2000	Chicago, IL	Attend seminar at invitation of Caterpillar S.A.R.L.
6.	Issam Barghouti	5–7 day trip in or about 2000 (precise dates not available)	Boston, MA	Attend meeting with Bose Corporation engineers regarding sound system for Haram Grand Mosque in Mecca
7.	Abdullah Awad Binladin	Approximately Feb. 24 –Mar. 6, 2001	Orlando, FL and San Diego, CA	Attend InfoSec World and Geospatial Information and Technology Association (GITA) conferences
8.	Yasser Bakr	Apr. 16–22, 2001	Greensboro, NC	Attend High Point furniture fair; purchase furniture
9.	Hesham Bendari	Aug. 2001 (precise dates not available)	Los Angeles, CA	Meeting with JD Edwards regarding software services for SBG Public Buildings & Airports Division

In addition, Dr. Fuad Rihani, a U.S. citizen who has worked for SBG since 1989 in a variety of positions, serving since 1997 as a Consultant/Advisor for Research and Development, from time to time traveled to meetings and conferences in the United States during the relevant time period.

Kingdom of Saudi Arabia
Western Province
City of Jeddah
Consulate General of the
United States of America



A handwritten signature in black ink, appearing to read "Azad Iqbal".

Azad Iqbal

Sworn to me this 30th day of June 2010

Cecelia K. El Khatib
Notary Public

Cecelia K. El Khatib
Consul of the
United States of America

My Commission Expires Indefinitely